

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

HI LINE SUPPLY CO., LTD., On Behalf of	:	
Itself and Others Similarly Situated,	:	
	:	Civil Action No. 12-859 (AET)(LHG)
Plaintiff,	:	
	:	
v.	:	
	:	
SIGMA CORPORATION, MCWANE, INC.,	:	
and STAR PIPE PRODUCTS, LTD.	:	
	:	
Defendants.	:	

**DEFENDANT, SIGMA CORPORATION’S, RESPONSE TO PLAINTIFF, HI LINE
SUPPLY CO., LTD.’S, MOTION FOR CONSOLIDATION UNDER FED. R. CIV. P. 42(a)
AND MOTION FOR APPOINTMENT OF TWO INTERIM CLASS COUNSEL AND
ONE LIAISON COUNSEL UNDER FED. R. CIV. P. 23(g)**

Defendant, Sigma Corporation (“Sigma”) responds as follows to Plaintiff, HI Line Supply Co., Ltd.’s, motion for consolidation under Fed. R. Civ. P. 42(a) and motion for appointment of two interim class counsel and one liaison counsel under Fed. R. Civ. P. 23(g) for direct purchaser plaintiffs.

First, Sigma does not oppose Plaintiff’s motion to consolidate pursuant to Fed. R. Civ. P. 42(a).

Second, Sigma takes no position with regard to Plaintiff’s motion for appointment of two interim class counsel and one liaison counsel for direct purchaser plaintiffs.

Finally, if the Court grant's Plaintiff's motion to consolidate, Sigma respectfully requests that the Court's Order reflect that any date for responding to Plaintiff's complaint is adjourned until thirty days after the parties file a consolidated, amended complaint.

Respectfully Submitted,

s/ Stephen J. Kastenberg

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Attorneys for Defendant Sigma Corporation

Dated: March 19, 2012

CERTIFICATE OF SERVICE

I, Stephen J. Kastenberg, Esquire, hereby certify that on the 19th day of March, 2012, a true and correct copy of the foregoing Response of Defendant, Sigma Corporation, to Plaintiff, HI Line Supply Co., Ltd.'s, motion for consolidation under Fed. R. Civ. P. 42(a) and motion for appointment of two interim class counsel and one liaison counsel under Fed. R. Civ. P. 23(g) for direct purchaser plaintiffs was served via first-class mail on:

Allyn Zissel Lite
Lite DePalma Greenberg, LLC
Two Gateway Center
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Newark, NJ 07102-5003

Attorneys for Plaintiff HI Line Supply Co., Ltd.

Dated: March 19, 2012

s/ Stephen J. Kastenberg
Stephen J. Kastenberg